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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No. 19-CR-171-ABJ-2
)
GREGORY J. BENNETT,)
)
Defendant.)

**UNOPPOSED MOTION TO MODIFY THE CONDITIONS OF RELEASE
TO ALLOW DEFENDANT TO TEMPORARILY LEAVE WYOMING**

COMES NOW, the Defendant, Gregory J. Bennett, by and through his attorney Jamie M. Woolsey hereby moves the Court to permit the Defendant to temporarily leave the State of Wyoming to travel to Williston, North Dakota from April 1, 2020 to April 2, 2020 for his employer. Defendant is employed by Midway Auto and RV and a customer has ordered an RV that requires delivery.

Eric Heimann, Assistant United States Attorney, has reviewed the request and has no objection to this motion.

DATED and SIGNED this 30th day of March, 2020.

/s/ Jamie M. Woolsey
Jamie M. Woolsey (WSB # 6-3985)
Sandefer & Woolsey, Trial Lawyers, LLC
143 N. Park Street
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(307) 232-1977

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served this 30th day of March, 2020, as follows:

United States Attorney's Office
Eric Heimann
2120 Capitol Ave, Suite 4000
Cheyenne, WY 82001

U.S. MAIL
 HAND DELIVERY
 EMAIL
 FACSIMILE
 CM/ECF

/s/ Jamie M. Woolsey
Jamie M. Woolsey